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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| IN RE:   | : Bankruptcy No. 17-24489-CMB |
|--|-------------------------------|
| James M. Ondek,                                  | : Chapter 13                  |
| Debtor(s).                                       | : Deleted to Claim No. 5      |
| James M. Ondek,                                  | : Related to Claim No. 5      |
| Movant(s),                                       | ·<br>:                        |
| V.   | :                             |
| NewRez, LLC, d/b/a Shellpoint Mortgage Servicing | :                             |
| and RONDA J. WINNECOUR, Trustee,                 | :                             |
| Respondent(s).                                   | :                             |
|  | <b>;</b>                      |

## PRAECIPE TO WITHDRAW OMNIBUS DECLARATION OF PLAN SUFFICIENCY FOR MORTGAGE PAYMENT CHANGES

- 1. Debtor filed his Omnibus Declaration of Plan Sufficiency for Mortgage Payment Changes on November 5, 2021.
- 2. It has been determined that the current plan payment is not sufficient to accommodate the mortgage payment fluctuations.
- 3. Therefore, the debtor hereby withdraws his Omnibus Declaration of Plan Sufficiency for Mortgage Payment Changes at Docket No. 87.

|        | Name of Creditor:   | NewRez LLC d/b/a Shellpoint Mortgage Servicing |  |
|--------|---------------------|--|--|
|        | Court Claim number: | Claim No. 5                                    |  |
|        |                     |  |  |
| Dated: | 11/22/21            | _  | /s/ Edward Leymarie, Jr., #27587         |
|        |                     |  | LEYMARIE CLARK LONG, P.C.                |
|        |                     |  | 423 Sixth Street, Ellwood City, PA 16117 |
|        |                     |  | (724) 752-1583                           |
|        |                     |  | Attorney for the Debtor                  |